

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ABEL BRAVO,  
on behalf of himself,  
FLSA Collective Plaintiffs and the Class,

Plaintiff,

Case No.: CV-12-9044

Cote, J.  
Francis, M.J.

v.

ESTABLISHED BURGER ONE LLC, et al.,

Defendants.

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JOSE MARTINEZ, SERGIO CERQUEDA,  
and ENRIQUE ALLENDE,  
on behalf of themselves,  
FLSA Collective Plaintiffs and the Class,

Plaintiffs,

Case No.: CV-13-7532

Cote, J.  
Francis, M.J.

v.

ESTABLISHED BURGER ONE LLC, et al.,

Defendants.

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**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS SETTLEMENT, PROVISIONAL CERTIFICATION OF THE  
SETTLEMENT CLASS, APPOINTMENT OF PLAINTIFFS' COUNSEL AS CLASS  
COUNSEL AND APPROVAL OF PLAINTIFFS' PROPOSED NOTICES OF  
SETTLEMENT**

Please take notice that upon the accompanying Memorandum of Law, Proposed Order, and Declaration of C.K. Lee and annexed materials, the Plaintiffs, on behalf of themselves and others similarly situated, by their undersigned attorneys, hereby move (without any opposition by Defendants) for the relief detailed in the Proposed Order in this Fair Labor Standards Act collective action and New York Labor Law class action.

Dated: April 30, 2014

Respectfully submitted,

LEE LITIGATION GROUP, PLLC  
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*Attorneys for Plaintiffs, FLSA Collective  
Plaintiffs and the Class members*

By: /s/ C.K. Lee  
C.K. Lee (CL 4086)